

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
GERALD STEVENS,

Plaintiff,

-against-

K. HANNA, Shield No. 0525, Correction
Officer of Fishkill Corr. Fac., et.al.,

Defendants.
-----X

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOCS

8/25/11

PLAINTIFF'S REQUEST FOR
LEAVE TO FILE DEPOSITIONS
BY WRITTEN QUESTIONS

10-Civ-3939 (AKH)

Plaintiff GERALD STEVENS, requests leave to file
Depositions by Written Questions upon the above captioned defendant
K. HANNA. Defendant must serve an answer within 14 days of receipt
of plaintiff's notice and direct questions pursuant to Rule 31 of
the Federal Rules of Civil Procedures.

DIRECT QUESTIONS UPON K. HANNA

1. State your name, badge number, title, tax registration
number, and business address for the record.
2. Were you assigned to Special Housing Unit, at Fishkill
Correctional Facility on January 20, 2010 ?
3. If your answer is yes, please describe any unusual in-
cident on that particular date, at approximately 3 or 4 p.m.,
4. Did you have any physical contact with inmate Gerald
Stevens, # 06-A-0760 ?

5. Did inmate Gerald Stevens sustained physical injuries on January 20, 2010 ?

6. Did you write a disciplinary report concerning this incident described in paragraph # 5 ?

7. Did plaintiff file a grievance complaint against you in regards to this incident ?

8. Did the Inmate Grievance Resolution Commitment sergeant investigate you concerning the incident described in paragraph # 6 ?

9. Did you sustain injuries on January 20, 2010, at Fish-Kill Correctional Facility ?

10. Have you ever been disciplinary by the Department of Correctional Services for the use of excessive force ?

Respectfully submitted:

Mr. Gerald Stevens

GERALD STEVENS, pro se
Coxsackie Corr. Fac.
P.O. Box 999
Coxsackie, New York

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the Depositions by Written Questions upon the New York State Attorney General, at 120 Broadway, New York, New York 10271-0332 by regular mail.

Sworn to under the penalty of perjury
pursuant to 28 U.S.C. § 1746

Mr. Gerald Stevens

GERALD STEVENS

Gerald Stevens

SWORN TO BEFORE ME THIS

23RD DAY OF JUNE, 2011

MUSCHETT

NOTARY

MUSCHETT, CECIL G.
Notary Public - State of New York
Qualified in Schenectady County
Commission Expires 06-07-2014

for Attorney Eric T. Schneiderman
to Mr. Ruby J. Kravick,
Clerk of the Court to forward to

Judge Alvin K. Hellerstein,
United States District Court
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

August 22, 2011

Re: Gerald Stevens v. K. Hanna, et al.

Enclosed is an original copy of my written deposition, I sent.
I am demanding a Response within 16 business day or I will seek and,
and ask for an order. (an order compelling your client K. Hanna, to answer

Please answer by September 1, 2011 Respectfully awaiting your Reply.

Sincerely yours
Mr. Gerald Stevens 06A0760

RECEIVED
JUNY PRO SE OFFICE

2011 AUG 25 PM 5:26

GERALD STEVENS
06-A-0760
Coxsackie Corr. Fac.
P.O. Box 999
Coxsackie, New York 12051-0999

June 23, 2011

Alvin K. Hellerstein
United States District Court
District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Gerald Stevens v. K. Hanna, et.al.,

Your Honorable Hellerstein:

PLEASE TAKE NOTICE that the above-named plaintiff moves this court for leave to file Depositions by Written Questions upon the defendant K. Hanna. See, Proposed Depositions, annexed herewith.

Much oblige.

Respectfully submitted,

Mr. Gerald Stevens
GERALD STEVENS

cc: Attorney General for
the State of New York
120 Broadway
New York, New York 10271-0332